

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

SECURITIES AND EXCHANGE)
COMMISSION,)
Plaintiff,)
v.) 1:21-cv-260-PB
)
LBRY INC.,)
Defendant,)
LBRY FOUNDATION INC.,)
Defendant-Intervenor.)

)

PARTIALLY ASSENTED-TO MOTION TO ADMIT
CORY C. KIRCHERT PRO HAC VICE

Defendant-Intervenor LBRY Foundation Inc. (“Foundation”), respectfully moves to admit Cory C. Kirchert *pro hac vice*, pursuant to Local Rule 83.2(b). In support of this motion, the Foundation states:

1. The Foundation has specifically retained Attorney Kirchert for his understanding and expertise in the issues to be litigated and it wishes for him to be involved in all stages of these proceedings;
2. The attached supporting affidavit, *see* Local Rule 83.2(b)(1), attests that Attorney Kirchert is a member in good standing of the bars of New York, Virginia, and several federal district and appellate courts. Attorney Kirchert is not currently suspended or disbarred in any jurisdiction, and there are no previous or pending disciplinary matters against him. Attorney Kirchert has no prior felony or misdemeanor criminal convictions. Finally, no court has ever denied an

application by Attorney Kirchert for admission *pro hac vice*, nor has any court ever revoked such status.

3. Attorney Kirchert will at all times be associated with the undersigned, who is a member of the bar of this Court.
4. The fee for admission is being paid contemporaneously with the filing of this motion. *See* Local Rule 83.2(b)(2).
5. A good-faith attempt was made to obtain concurrence in the relief sought by this motion. *See* Local Rule 7.1(c). Counsel for plaintiff assents to the relief sought. At the time of filing, defendant LBRY, Inc. had not yet provided a position concerning this motion
6. This motion is supported entirely by the accompanying affidavit of Attorney Kirchert and the points made above, and therefore does not require a memorandum. *See* Local Rule 7.1(a)(2).

WHEREFORE, the Foundation respectfully requests that the Court admit Cory C. Kirchert *pro hac vice*.

July 2, 2021

Respectfully submitted,

LBRY Foundation, Inc.

By its attorneys,

/s/ Simon R. Brown

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CERTIFICATE OF SERVICE

I hereby certify that, on July 2, 2021, I caused true and correct copies of the foregoing Assented-to Motion to Admit Cory C. Kirchert *Pro Hac Vice* together with its supporting affidavit to be served on counsel of record for all parties that have appeared to date through the Court's CM/ECF system as listed below.

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/s/ Simon R. Brown

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